

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROBERT GLICK, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ARQIT QUANTUM INC. F/K/A CENTRICUS
ACQUISITION CORP., DAVID WILLIAMS,
NICK POINTON, CARLO CALABRIA,
STEPHEN CHANDLER, MANFREDI
LEFEBVRE D'OVIDIO, VERALINN
JAMIESON, GARTH RITCHIE, AND
STEPHEN WILSON,

Defendants.

Case No. 1:22-cv-02604-PKC-MMH

NOTICE OF MOTION OF FLORENT LILIAN JANIN
FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Florent Lilian Janin (“Janin”), by and through his counsel, will and does hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an Order: (1) appointing Janin as Lead Plaintiff on behalf of (i) all persons or entities who purchased or otherwise acquired Arqit Quantum Inc. (“Arqit”) f/k/a Centricus Acquisition Corp. (“Centricus”) securities between September 7, 2021 and April 18, 2022, inclusive, and/or (ii) all holders of Centricus securities as of the record date for the special meeting of shareholders held on August 31, 2021 to consider approval of the merger between Arqit and Centricus (the “Merger”) and entitled to vote on the Merger (the “Class”); and (2) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

Janin is aware of Local Civil Rule 37.3(a), which provides, in relevant part, that “[p]rior to seeking judicial resolution of a . . . non-dispositive pretrial dispute, the attorneys for the affected parties . . . shall attempt to confer in good faith in person or by telephone in an effort to resolve the dispute[.]” Here, pursuant to the PSLRA, the deadline to file a motion for appointment as Lead Plaintiff in the above-captioned action is July 5, 2022, on which date any member of the putative Class may so move. *See* 15 U.S.C. § 78u-4(a)(3)(A)(i)(II) & (a)(3)(B)(i)-(ii). Janin will thus not know the identities of the other putative Class members, if any, who intend to file competing Lead Plaintiff motions until July 6, 2022—the day after the statutory deadline—making conferral with opposing parties prior to the filing of Janin’s motion papers impracticable. Under these circumstances, Janin respectfully requests that compliance with Local Civil Rule 37.3(a) be waived in this instance.

Dated: July 5, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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Additional Counsel for Florent Lilian Janin